



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

June 16, 2023

By ECF

The Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records v. United States Citizenship and Immigration Services*, 23
Civ. 1997 (PAE)

Dear Judge Engelmayer:

This Office represents the United States Citizenship and Immigration Services (“Government”), defendant in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). With plaintiffs’ consent, we write respectfully to request a 30-day extension of time to file the Government’s response to the complaint, currently due June 26. If the Court were to grant this request, the Government’s response would be due July 26. The reason for this request is that the parties continue to negotiate a possible resolution of the Plaintiffs’ “policy and practice” claim. Additional time is necessary for the parties to determine whether they will be able to resolve the issue, which in turn will help the Government decide how to respond to the complaint, and in particular whether the parties will need to engage in motion practice over the “policy and practice” claim.

This is the Government’s second request for an extension. *See* ECF No. 8. The Court granted the first request. *See* ECF No. 9.

This request does not affect any other scheduled dates.

We thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/ Ilan Stein
ILAN STEIN

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